

Message

From: Chiccine, Catherine [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55AD7B3B57A242A59AFC49CA0CDE192A-CHICCINE, C]
Sent: 4/15/2020 7:18:12 PM
To: Daniel Fischer [Daniel@kohorstlaw.com]
Subject: RE: Citizens Gas and Electric

Here is her direct email – I realized it wasn't on the signature block I provided:

Barrientos, Brittany A. <brittany.barrientos@stinson.com>

From: Chiccine, Catherine
Sent: Wednesday, April 15, 2020 2:07 PM
To: Daniel Fischer <Daniel@kohorstlaw.com>; KCM.LAATeam2@stinson.com
Cc: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Subject: RE: Citizens Gas and Electric

Daniel,

Great, thank you so much for your response. I would suggest that you contact Brittany Barrientos, Black Hills' attorney, and coordinate with her. Here is her contact information:

Brittany A. Barrientos

Partner

STINSON LLP
1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
Direct: 816.691.2358 \ [Bio](#)

Assistant: KCM.LAATeam2@stinson.com \ 816.691.2761

EPA suggests that all the PRPs submit one response/redlined draft of the ASAOC to EPA, as it makes the negotiation process much more manageable. Feel free to call or email me if you have any further questions or would like to discuss.

Best,

Cathie Chiccine | Attorney-Advisor
United States Environmental Protection Agency, Region 7
913.551.7917 | 11201 Renner Boulevard, Lenexa, Kansas 66219
chiccine.catherine@epa.gov

From: Daniel Fischer <Daniel@kohorstlaw.com>
Sent: Wednesday, April 15, 2020 1:19 PM
To: KCM.LAATeam2@stinson.com; Chiccine, Catherine <chiccine.catherine@epa.gov>
Cc: Andy Sondag <a_sondag@yahoo.com>
Subject: Re: Citizens Gas and Electric

Cathie and Brittany,

I am the attorney for T & A Real Estate, LLC. We are in receipt of the letter dated March 26, 2020 regarding the Citizens Gas & Electric Company Superfund Site in Council Bluffs, Iowa and classification of T & A Real Estate, LLC as a potentially responsible party.

We believe that T & A Real Estate, LLC is entitled to numerous defenses to liability, including status as an innocent landowner and limited ability to pay.

Notwithstanding those defenses, we are willing to participate in negotiations and cooperate with the group's efforts and discussions. If there is anything we can do to assist, please let me know.

We've also mailed the attached letter to Mary Peterson.

Thanks,

Daniel P. Fischer

Kohorst & Fischer Law Firm, PLLC

602 Market Street, Suite 101

Harlan, IA 51537

Phone (712) 755-3156 / Fax (712) 755-7404

daniel@kohorstlaw.com

From: Andy Sondag <a_sondag@yahoo.com>

Sent: Wednesday, April 15, 2020 12:56 PM

To: Daniel Fischer <Daniel@kohorstlaw.com>

Subject: Fwd: Citizens Gas and Electric

Sent from my iPhone

Begin forwarded message:

From: Sondag Law <sondaglaw@pas1.omhcoxmail.com>

Date: April 15, 2020 at 10:31:54 AM CDT

To: andy sondag <a_sondag@yahoo.com>

Subject: Fw: Citizens Gas and Electric

Andy -

See below email just received from EPA.

I emailed you 3-27-20 and 4-1-20 about this matter. Trusting you have contacted an attorney and you should promptly forward this email to that counsel so he/she can respond.

Thanks and advise back if questions.

- PAS

From: Chiccine, Catherine
Sent: Wednesday, April 15, 2020 9:38 AM
To: sondaglaw@pas1.omhcoxmail.com
Subject: Citizens Gas and Electric

Mr. Sondag,

I hope you are staying healthy and safe. I just wanted to touch base with you regarding the Citizens Gas and Electric letter I sent you. Is T&A Real Estate going to participate in the negotiation? Please let me know at your earliest convenience. You may want to contact Brittany Barrientos, Black Hills' attorney, regarding coordination of response and redlines to the draft ASAOC EPA sent. Her contact information is:

Brittany A. Barrientos
Partner

STINSON LLP
1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
Direct: 816.691.2358 \ [Bio](#)

Assistant: KCM.LAATeam2@stinson.com \ 816.691.2761

Cathie Chiccine | Attorney-Advisor
United States Environmental Protection Agency, Region 7
913.551.7917 | 11201 Renner Boulevard, Lenexa, Kansas 66219
chiccine.catherine@epa.gov